

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-021 (GMS) (LPS)
)	CONSOLIDATED
COBALT LABORATORIES INC., et al.,)	
)	
Defendants.)	

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	C.A. No. 08-022 (GMS) (LPS)
BARR LABORATORIES, INC., et al.,)	
)	
Defendants.)	

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-052 (GMS) (LPS)
)	
DR. REDDY'S LABORATORIES, INC., et)	
al.,)	
)	
Defendants.)	

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-291 (GMS) (LPS)
)	
ORGENUS PHARMA INC.,)	
)	
Defendant.)	

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-336 (GMS) (LPS)
)	
APOTEX INC., et al.,)	
)	
Defendants.)	

STIPULATED JURISDICTIONAL DISCOVERY SCHEDULE

Plaintiffs Forest Laboratories, Inc., Forest Laboratories Holdings Ltd., Merz Pharma GmbH & Co. KGaA, and Merz Pharmaceuticals GmbH (collectively "Plaintiffs") and Defendants Orgenus Pharma, Inc. ("Orgenus") hereby stipulate as follows:

1. Plaintiffs may serve on Orgenus a total of eight (8) interrogatories, and Orgenus may serve on Plaintiffs a total of two (2) interrogatories, all limited to issues concerning jurisdictional discovery. Such interrogatories must be served on or before July 7, 2008, and responses are due on July 25, 2008. The parties further agree, pursuant to Fed. R. Civ. P. 26(b)(2) and 33(a)(1), that the interrogatories served in connection with jurisdictional discovery are separate and apart from the interrogatories on the merits to which the parties would be entitled during potential fact discovery in this case.

2. Plaintiffs may serve on Orgenus a total fifteen (15) document requests, limited to issues concerning jurisdictional discovery. Such document requests must be served on or before July 7, 2008, and Orgenus' responses are due on July 25, 2008.

3. Plaintiffs may serve on Orgenus a total of ten (10) requests for admission, limited to issues concerning jurisdictional discovery. Such requests for admission must be served on or before July 7, 2008, and Orgenus' responses are due July 25, 2008.

4. Plaintiffs may serve a deposition notice under Fed. R. Civ. P. 30(b)(6) on Orgenus. Such notice will include particular topics limited to jurisdictional discovery and will be served on or before July 8, 2008. The deposition of the witness that Orgenus has designated to testify on the listed topics shall occur no later than August 15, 2008 in New York, New York, and will be limited to four (4) hours of deposition testimony. The parties have agreed that this time limit may be extended if the presence of an interpreter at the deposition is necessary for translation purposes. The parties have further agreed that such deposition will not occur until at least seven (7) calendar days after Orgenus' document production is complete.

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SO ORDERED THIS _____ day of July, 2008.

The Honorable Leonard P. Stark
United States Magistrate Judge